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10 Attorneys for Nathan Cherney, Kaare Mathison,
11 Allen Grove, Christina Clyburn, and Blaire Fulcher

12 UNITED STATES DISTRICT COURT
13 FOR THE CENTRAL DISTRICT OF CALIFORNIA
14 WESTERN DIVISION
15

16 DONALD LEO MELLEIN,

17 Plaintiff,

18 v.

19 UNITED STATES OF AMERICA, et
20 al.,

21 Defendants.
22
23

No. 2:23-cv-07970-RGK-MAR

**STIPULATION TO EXTEND TIME TO
RESPOND TO INITIAL COMPLAINT
BY NOT MORE THAN 30 DAYS (L.R.
8-3)**

Complaint Served: December 22, 2023
Current Response Date: February 20, 2024
New Response Date: March 21, 2024

Honorable R. Gary Klausner
United States District Judge

24 Counsel for plaintiff Donald Leo Mellein (“Plaintiff”) and defendants Nathan
25 Cherney, Kaare Mathison, Allen Grove, Christina Clyburn, and Blaire Fulcher
26 (hereinafter collectively referred to as the “Additional Individual Defendants”) hereby
27 enter into the following stipulation to extend defendants’ deadline to respond to the First
28

Amended Complaint. The stipulation is based on the following:

1. Plaintiff served his First Amended Complaint on defendants Nathan Cherney, Blaire Fulcher, Allen Grove, and Kaare Mathison on December 22, 2023. Plaintiff served his First Amended Complaint on defendant Christina Clyburn on January 2, 2024.

2. Nathan Cherney, Blaire Fulcher, Allen Grove, and Kaare Mathison's deadline to respond to the First Amended Complaint is February 20, 2024. Christina Clyburn's deadline to respond to the First Amended complaint is March 4, 2024.

3. The parties hereby stipulate that the Additional Individual Defendants shall have an additional thirty (30) days from February 20, 2024 through and including March 21, 2024, to respond to the First Amended Complaint.

Dated: February 16, 2024

Respectfully submitted,

INSTITUTE FOR JUSTICE
Joseph Gay*
Robert Frommer*
Robert E. Johnson*

THE VORA LAW FIRM, P.C.
Lou Egerton-Wiley
Nilay U. Vora
Jeffrey Atteberry

/s/ Joseph Gay

JOSEPH GAY

Counsel for Plaintiff

* Admitted *pro hac vice*

1 Dated: February 16, 2024

E. MARTIN ESTRADA
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6 /s/ Jasmin Yang

JASMIN YANG

Assistant United States Attorney

Attorneys for Nathan Cherney, Kaare Mathison,
Allen Grove, Christina Clyburn, and Blaire Fulcher

12 ATTESTATION UNDER LOCAL RULE 5-4.3.4

13 I, Jasmin Yang, am the ECF User whose ID and password are being used to file
14 this STIPULATION TO EXTEND TIME TO RESPOND TO INITIAL COMPLAINT
15 BY NOT MORE THAN 30 DAYS (L.R. 8-3). In compliance with Local Rule 5-
4.3.4(a)(2), I hereby certify and attest that Plaintiff's counsel, Joseph Gay, has concurred
in this filing.

16 DATED: February 16, 2024

/s/ Jasmin Yang

17 JASMIN YANG

Assistant United States Attorney